

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

ALBERTO OSUNA SANCHEZ,

Plaintiff,

v.

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

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Case No.: 3:25-cv-62

**STIPULATION AS TO USE OF DECLARATIONS AND MATERIALS AT THE
PRELIMINARY INJUNCTION HEARING**

Plaintiff Alberto Osuna Sanchez and Defendant NCAA agree and stipulate that for purposes of the hearing on Plaintiff Alberto Osuna Sanchez's Motion for Preliminary Injunction that both sides may use and rely upon at the hearing, and the Court may consider, the Verified Complaint, the Declarations and referenced articles cited by the parties and materials in the public record. The parties stipulate that the Court may consider the referenced Declarations, articles and materials for purposes of assessing and ruling on Plaintiff's Motion for Preliminary Injunction. The parties do not stipulate to the accuracy of any information contained therein.¹ Neither party concedes that the other party's expert's opinions provided by Declarations are accurate, just that for purposes of the hearing the Court is free to consider each opinion as the Court chooses. The parties have further discussed and agreed that neither side intends to call any witnesses to testify live at the preliminary injunction hearing.

¹ Notwithstanding the foregoing, the NCAA reserves any objections to the Court's consideration of new evidentiary materials submitted with Plaintiff's Reply, to which the NCAA has not had the opportunity to respond.

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s/ Chad Hatmaker

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, a copy of the foregoing Stipulation as to Use of Declarations and Materials at the Preliminary Injunction Hearing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/ J. Chadwick Hatmaker

J. Chadwick Hatmaker, BPR 018693

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